

Response to Secretary of State's Request for Information

General

EDF, throughout the consultation period, has failed to respect the residents and their views. It has not been prepared to listen to representations nor work with residents to address their concerns. One of the major issues has been the number of changes brought forward at the last minute during the examination. This can only show how ill-prepared the company has been despite the inordinate time it has taken to bring the project forward for planning. Hinkley only took around five years to secure consent. SZC has been on the go 11 years so far. I do not know how many post-submission changes there were at Hinkley, but the 19 at Sizewell must be some kind of record.

In its response to Middleton Parish council (PINS ref. p325 doc 9.1 under REP1-013) EDF says:

"The EPR™ design is now successfully operating at Taishan 1 and 2 in China. *The French (Flamanville) and Finnish (Olkiluoto) Projects experienced delays as a result of an incomplete design. (My italics.)* Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. We have a very good understanding of Project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR™ construction and this has informed the proposals assessed within the ES."

I cannot believe that EDF think that it is acceptable to start any major construction project with incomplete plans – let alone a nuclear power station. The French and Finnish projects were/are more than 12 years behind schedule and at least four times over budget. Taishan 1 is now non-operational and Taishan 2 is approaching the age when Taishan 1 began to experience its problems. In mitigation Hinkley is currently only three years or so behind schedule and a mere 25% over budget. On basis of its track record, we should not trust the company to build a garden shed.

EDF appears to have learned nothing from its experience with the French and Finnish reactors. It is throwing together its ill-considered construction management plans at the last moment on the hoof.

It started the examination with incomplete plans and I have no doubt that, if the development were to be approved, EDF will come back with a whole series of damaging further changes which will be hard to resist once the project has started.

The following are the individual issues that relate to EDF's approach to this project and throws their competence in question, which is particularly worrying when we are talking about nuclear power.

The Sizewell Relief Road (SLR)

Right from the off, the community wanted an alternative route to the B1122 for construction traffic - and that it should be completed before any work started on site. EDF insisted that planning would preclude any new road building without an order from the Department of Transport. So, it came as a big surprise when the company came up with its proposals for the SLR out of the blue.

The local community were incredulous. The route seemed designed to maximise severance and damage to the local environment and agricultural units. The road duplicated the B1122 and would have no lasting benefit. Many residents believed the proposal was so daft, that EDF had put it forward to be rejected by the community. Many, like me, now believe it should be dug up and the land and severed lanes restored on the completion of the development. Route W (formerly D) which was supported by the community and County Council was summarily dismissed on a number of spurious grounds.

It now emerges that the real reason for the current proposed route was “mass balance” i.e. taking fill excavated from the construction of the road and using it on the main site development. EDF claims that this will obviate bringing in fill from further afield. What it really means is that it will save it money.

If, consent were to be granted for SZC, ideally it should be on condition that access is by a different more sustainable route. If not, the SLR should be completed before development starts and removed on completion with the land and lanes restored.

Desalination Plant

EDF was warned about problems with potable water supply at the outset of consultation, 11 years ago. It did nothing about it for ten years, EDF has not convinced anyone that it will be able to secure an alternative supply. Its proposals for the siting of a permanent underground plant will seriously damage the Sizewell Marsh SSSI, adjacent Minsmere SSSI and the important connecting habitat in between the two.

Biodiversity

The building of SZC will cause enormous ecological damage to the area - not just to the construction site per se, but also to the surrounding area of enormous ecological importance. Its claims that compensatory areas will enable long term recovery of biodiversity are pure conjecture. And even if the company is right, the immediate decline will be severe and last for many years.

Marilyn Hands - PINS ref 20026108